

EXHIBIT A

INTERROGATORY NO. 3

Please state the highest level of education that you have achieved and please identify the name of any institution from which you have been awarded a degree or certificate, please state the degree or certificate awarded and the year awarded.

ANSWER: Princeton University, A.B, 1975.

INTERROGATORY NO. 4

Please provide a list of your current employer and your employer of any business in which you were engaged at the time of the accident and for each employer or business, please state your rate of pay and the number of hours weekly that you are employed.

ANSWER: Forrence Orchards, apple business, rate of pay depends upon the crop, typically 11-12 hour days all year long.

INTERROGATORY NO. 5

Please state in detail, for what purpose William Forrence was operating the 2004 Ford Explorer, owned by you, [and what your relationship to William Forrence is], on August 6, 2006, in Burlington, Vermont. Please include in your response where he was coming from and where he was going to, just before and after the accident on August 6, 2006.

ANSWER: William [known as Henry], is my son. He was in Burlington, Vermont and was driving to meet his mother and me at the boat dock in Willsboro, NY.

INTERROGATORY NO. 6

Regarding the accident of August 6, 2006, please describe, in your own words, what you were told by William Forrence had occurred, and any reasons he told you as to the cause[s] of the accident.

ANSWER: Henry called us from his cell phone, and stated that a motorcycle had run into him. I asked if everyone was all right, and Henry said yes. I cannot recall any other details.

INTERROGATORY NO. 7

Please list each witness known to you regarding the accident of August 6, 2006.

ANSWER: I don't know any other witness besides Henry.

INTERROGATORY NO. 8

Please state, whether or not, William Forrence had your authorization to operate your motor vehicle on August 6, 2006.

ANSWER: Yes.